

WWR# 041784149

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:  
Vladimir Chichilo

Debtor

American Heritage Credit Union.

Movant

CASE NO. 25-10992-djb  
CHAPTER 13

**Hearing Date: 06/12/2025**  
**Hearing Time: 11:00 A.M.**

**MOTION BY AMERICAN HERITAGE CREDIT UNION FOR RELIEF FROM AUTOMATIC STAY  
PURSUANT TO 11 U.S.C. SECTION 362(d) AND WAIVER OF 14-DAY STAY UNDER FED. BANKR.  
RULE 4001(a)(3)**

The Motion of Movant, by its attorney, Milos Gvozdenovic, Esquire, respectfully represents:

1. On 03/13/2025, the Debtor filed a voluntary petition commencing a case under Chapter 13, Title 11, United States Code, and for the entry of an Order for Relief.
2. Movant holds a valid security interest in one 2018 Ford F-150, VIN #1FTFW1EG1JFB93911, evidenced by a Certificate of Title ("Title"). A copy of a Retail Installment Contract executed by Debtor, and the Title are attached hereto as Exhibit "A".
3. This is an action under 11 U.S.C. Section 362(d) to vacate or modify a stay granted under 11 U.S.C. Section 362(a) to permit repossession and sale of the subject vehicle.
4. At the time of the filing of this Motion, the Debtor has defaulted on the payments due under the Note for the 01/30/2025 through 04/30/2025 payments, and together with attorney's fees and court costs, the Debtor owes Movant \$3,403.88 on account of such defaulted payments.
5. The Debtor's Payoff balance as of 05/06/2025 is \$24,258.86.
6. Pursuant to Schedule B of Debtor's petition, the vehicle has a current value of \$15,471.00.
7. Movant is entitled to relief pursuant to 11 U.S.C. 362 (d)(1) because there is little or no equity in the collateral for the benefit of the bankruptcy estate. Movant is not adequately protected.
8. Debtor has elected to surrender the subject collateral. Movant further requests the right to file a claim for any unsecured deficiency balance remaining after the seizure and sale of the collateral. Any surrender should only be for the value of the collateral.

WHEREFORE, Movant prays that the stay pursuant to Section 362(a) of Title 11 United States Code be modified to allow Movant to exercise all of its remedies under its loan documentation and under state law to

proceed with repossession and sale of the subject vehicle, the 14-day stay provided by Fed. Bankr. Rule

4001(a)(3) is waived, and that it have such other relief as is just.

/s/ Milos Gvozdenovic

Milos Gvozdenovic

Weltman, Weinberg & Reis Co., L.P.A.

Attorney for Movant

5990 West Creek Road, Suite 200

Independence, OH 44131

216-739-5647

mgvozdenovic@weltman.com